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**By: U.S. Mail**

Hon. Leslie G. Foschio, USMJ  
United States District Court  
Western District of New York  
2 Niagara Square – 7th Floor  
Buffalo, New York 14202

Dear Judge Foschio:

Re: *Martin Gugino v. City of Buffalo, et al.*  
Case No. 1:21-cv-283

I am writing to request an extension of time to complete fact depositions in this matter. The current deadline to complete the fact depositions is January 31, 2025, and we request an extension to February, 7, 2025. This request is made due to the recent weather related closures of Buffalo City Hall and personnel turnover at City Hall as well. These developments necessitate a very short amount of additional time to make our witness available and prepare them for the deposition. The deposition is currently scheduled for February 4, 2025, and we plan to make our witness available on that date.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Peter Sahasrabudhe

Peter Sahasrabudhe

cc: Melissa Wischerath, Esq.  
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